UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL NO. 15-10347-PBS
	)	
VINCENT C. ANZALONE	)	

MOTION TO CONTINUE SENTENCING HEARING

Defendant, Vincent Anzalone, respectfully moves that the sentencing hearing in this matter, now scheduled for April 20, 2017, be continued until April 26, 2017 or as soon thereafter as is convenient to the Court. As support for this Motion, undersigned counsel states that the Probation Department has issued its final Presentence Report. The parties, however, jointly disagree with the Probation Department's calculation of the guideline sentencing range and also disagree between themselves on a specific enhancement. Moreover, the parties will be making differing recommendations as to the sentence the Court should impose. Undersigned counsel has begun drafting a sentencing memorandum to address each of these issues. Counsel's ability to complete and timely file the memorandum, however, has been challenged by unexpectedly emergent matters in another complex sentencing matter before Judge Gorton, *United States v. Joseph Debrum*, Criminal No. 15-10292-NMG, preparation for trial (now pled and awaiting sentencing) before this Court in *United States v. Kemal Barnes*, Criminal No. 17-10006-PBS, and an upcoming trial before Judge Casper in *United States v. Marion Griffin*, Criminal No. 15-10023-DJC, for which counsel is preparing. These competing matters have made timely filling a sentencing memorandum impossible. A brief continuance of the sentencing hearing will permit counsel to file a thorough sentencing memorandum with adequate time for the parties and the Court to consider and address the disputed issues at sentencing.

The government has not yet replied to counsel's request for assent to this Motion. While some victim impact letters have been submitted to the Probation Department, upon information and belief none of the victims have indicated a desire or intention to be present at the sentencing hearing.

VINCENT ANZALONE
By his attorney,

/s/ Timothy G. Watkins
Timothy G. Watkins
Federal Defender Office
51 Sleeper Street, 5th Floor
Boston, MA 02210
Tel: 617-223-8061

CERTIFICATE OF SERVICE

I, Timothy G. Watkins, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), as well as to U.S. Probation Officer Ryan Fox by email, on April 19, 2017.

/s/ Timothy G. Watkins
Timothy G. Watkins